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## Alaska Telephone Association

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Christine O'Connor  
Executive Director

March 3, 2016

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

RE: Ex parte filing in WC Docket No. 10-90

Dear Ms. Dortch:

On March 1<sup>st</sup> the undersigned, joined by Steve Merriam and Jens Laipenieks from Arctic Slope Telephone Association Cooperative in Anchorage, AK, met telephonically with Jim Schlichting, Sue McNeil, Chris Helzer, Paroma Sanyal, Claire Wack and Matt Warner from the Wireless Telecommunications Bureau to discuss the Alaska Plan.

Arctic Slope Telephone Association Cooperative (ASTAC) previously submitted performance obligations as part of the Alaska Plan.<sup>1</sup> During the call we reviewed characteristics of ASTAC's Arctic service area including extreme climate, difficult geography and high costs. We discussed new and upgraded wireless broadband service which will be provided to the villages in ASTAC's service area in accordance with the performance obligations.

Pursuant to Section 1.1206 of the Commission's rules, this ex parte letter is being filed via ECFS in WC Docket 10-90.

Respectfully submitted,

*Via ECFS 3/3/2016*

Christine O'Connor  
Executive Director

cc: Jim Schlichting  
Sue McNeil  
Chris Helzer  
Paroma Sanyal  
Claire Wack  
Matt Warner

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<sup>1</sup> See ex parte notice filed by Alaska Telephone Association, November 19, 2015.

## Arctic Construction and Maintenance Challenges on the North Slope

Building and maintaining outside plant in the Arctic presents many challenges that are found nowhere else in America. It is hard to imagine a fair comparison to similarly situated companies outside the few that border ASTAC on its southern boundary. Our lack of roads, extreme cold, blizzards, widely dispersed insular communities and a very short construction season all drive up the cost to bring telecommunications services to the Inupiat people of the North Slope.

- The lack of roads<sup>1</sup> means everything from personnel to equipment has to be flown or delivered by air cargo. As you can see by the following schedules, flights from our hubs in Barrow and Deadhorse are protracted, with limited opportunity to come and go. There are no direct flights from Deadhorse to Anaktuvuk Pass. Our choices are to either charter for ~\$3000 per trip or fly to Fairbanks, overnight and switch carriers to get into Anaktuvuk Pass. The return path is similar and there is little difference in cost when you consider hotel, per diem and non-productive labor during travel.

The screenshot shows the Era Alaska website in a Windows Internet Explorer browser. The page displays flight schedules for Barrow, Alaska. The search criteria are set to "One Way" from Barrow, US (BRW) to Point Hope, US (PHC) on 08/02/2012. The results show a weekly flight operated by Hageland Aviation.

Departs	Arrives	Flight Info	Operated By	Stops	Duration	Mo	Tu	We	Th	Fr	Sa	Su	Details
9:30AM	11:15AM	7H 3362*	Hageland Aviation	1	01hr 45 min								

Barrow - Point Hope - the week including Thursday, August 2, 2012

Departs	Arrives	Flight Info	Operated By	Stops	Duration	Mo	Tu	We	Th	Fr	Sa	Su	Details
11:45AM	1:15PM	7H 3363*	Hageland Aviation	1	01hr 30 min								

Point Hope - Barrow - the week including Thursday, August 2, 2012

Providing service to Point Hope from Barrow involves an hour and forty five minute plane ride, one way, with twice weekly flights.

<sup>1</sup> Deadhorse is the only exchange that has terrestrial transportation via the Dalton Highway.

Timetables | Era Alaska - Windows Internet Explorer

http://www.flyera.com/timetables

File Edit View Favorites Tools Help

Get more Add-ons Customize Links Free AOL & Unlimited Inte... Free Hotmail RealOne Player University of Phoenix eCa... University of Phoenix

Timetables | Era Alaska

Round Trip One Way

Departure: Prudhoe Bay/Deadhorse, US (SCC) Arrival: Fairbanks, US (FAI)

Departure Date: 08/02/2012 Return Date: 08/02/2012

Show: All Flights Weekly

Book Search

Prudhoe Bay/Deadhorse - Fairbanks - the week including Thursday, August 2, 2012

Departs	Arrives	Flight Info	Operated By	Stops	Duration	Mo	Tu	We	Th	Fr	Sa	Su	Details
1:00PM	3:50PM	7H 3502* 7H 3503*	Hageland Aviation Hageland Aviation	2	02hr 50 min								
1:50PM	3:25PM	7H 781	Era Aviation	0	01hr 35 min								

Fairbanks - Prudhoe Bay/Deadhorse - the week including Thursday, August 2, 2012

Departs	Arrives	Flight Info	Operated By	Stops	Duration	Mo	Tu	We	Th	Fr	Sa	Su	Details
8:45AM	11:35AM	7H 3500* 7H 3501*	Hageland Aviation Hageland Aviation	2	02hr 50 min								
11:00AM	12:35PM	7H 780	Era Aviation	0	01hr 35 min								

Error on page.

Internet | Protected Mode: Off

9:32 AM 8/2/2012

Anaktuvuk Pass Schedules and Fares - Windows Internet Explorer

http://www.wrightair.net/AnaktuvukPass.htm

File Edit View Favorites Tools Help

Get more Add-ons Customize Links Free AOL & Unlimited Inte... Free Hotmail RealOne Player University of Phoenix eCa... University of Phoenix

Anaktuvuk Pass Schedules and Fares

**WRIGHT AIR SERVICE** Fairbanks International Airport East Ramp (907) 474-0502

ANAKTUVUK PASS SCHEDULES AND FARES

See Also: [Anaktuvuk Pass to Fairbanks](#) [Anaktuvuk Pass to Bettles](#) [Anaktuvuk Pass to Cold Foot](#) [Anaktuvuk Pass to Allakaket](#)

**Fairbanks To Anaktuvuk Pass**

Flight	Depart	Arrive	Frequency	One Way Fare Adult	Round Trip Adult	One Way Fare Child	Round Trip Child	Excess Baggage/LB.
300	8:15 a.m.	9:50 a.m.	M-F	\$180.00	\$360.00	\$140.00	\$280.00	.85
320	1:00 p.m.	2:35 p.m.	M-F	\$180.00	\$360.00	\$140.00	\$280.00	.85
370	10:15 a.m.	12:30 a.m.	Sat.-Sun.	\$180.00	\$360.00	\$140.00	\$280.00	.85

**Anaktuvuk Pass to Fairbanks** [Back To Top](#)

Flight	Depart	Arrive	Frequency	One Way Fare Adult	Round Trip Adult	One Way Fare Child	Round Trip Child	Excess Baggage/LB.
301	10:10 a.m.	11:45 a.m.	M-F	\$180.00	\$360.00	\$140.00	\$280.00	.85
321	2:45 p.m.	4:20 p.m.	M-F	\$180.00	\$360.00	\$140.00	\$280.00	.85
371	12:35 p.m.	2:40 p.m.	Sat.-Sun.	\$180.00	\$360.00	\$140.00	\$280.00	.85

Done

Internet | Protected Mode: Off

9:33 AM 8/2/2012

There are no direct flights to Anaktuvuk Pass from Barrow unless we charter the entire plane.





Anaktuvuk Pass in July. Summer construction season is 75-90 days.



Construction in the Arctic.

Extreme cold and blizzards hamper operations, making the simplest tasks like getting to work an issue. Extreme cold is our reality and we mitigate cold injuries by investing in the proper clothing, equipment and safety training and standards, but not without some corresponding decrease in work output during inclement periods.



ASTAC technician vehicles at camp the morning after a blizzard (above) and what they found at our central office after digging out at camp (below).





Operating expenses for maintenance of existing facilities are higher than the norm because everything is either flown in or barged over brief summer. As examples, gasoline can exceed \$9 per gallon in some of our exchanges where it is flown in. Electricity is \$.29 per kilowatt hour, almost three times the national average of \$.1029 per kilowatt hour.<sup>2</sup>



Extreme cold, darkness and stormy weather are our operating realities.

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<sup>2</sup> [http://www.eia.gov/electricity/monthly/epm\\_table\\_grapher.cfm?t=epmt\\_5\\_03](http://www.eia.gov/electricity/monthly/epm_table_grapher.cfm?t=epmt_5_03)

Permafrost exists year round and impedes trenching, requiring extensive replacement of teeth on the Ditch Witch saw just to plow a short section of cable.



“Super Sucker” tankers (at \$345 each per hour) are used to remove material from co-location trenches to protect other utilities’ facilities (e.g. gas and power). An average trenching job may require two tankers for the length of the project. Because of the brief construction period and the cost to mobilize and safeguard the open trench at the end of each shift, technicians generally work twelve or more hours per day.





Cold and darkness are a constant for much of the year.





Even with the coming of spring and the return of the sun, winter's challenges linger.



After months of total darkness, "spring" wind storms can damage facilities and close roads.



Alaska is unique; the North Slope is extreme!



### **ASTAC deploys broadband cellular network on the edge of exploration.**

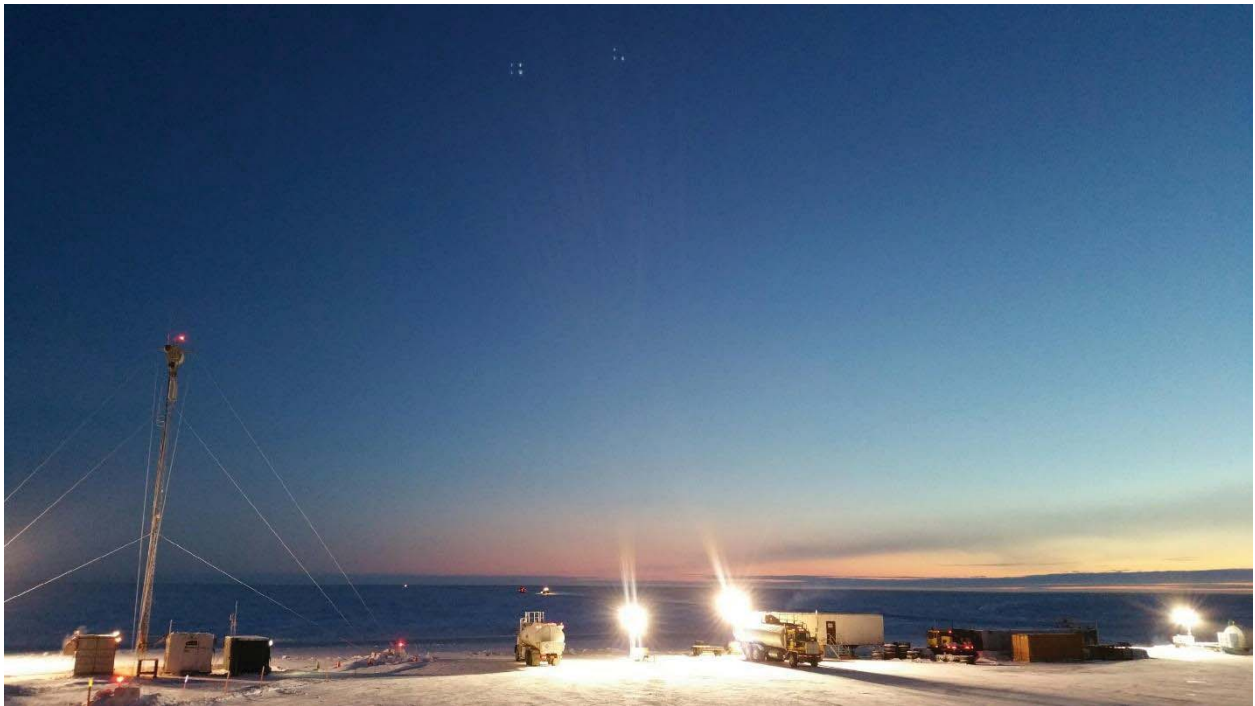
ConocoPhillips NPR-A exploration workers get high speed data/voice service

Anchorage, Alaska – Arctic Slope Telephone Cooperative Association (ASTAC) has teamed with AT&T and North Slope Telecom, Inc. to provide ice road crews and other workers superior connectivity in one of the most remote areas of the state. A development project in the Greater Moose's Tooth Unit of the National Petroleum Reserve – Alaska was announced this past November. Ice road construction to the development site began last month. ASTAC and the team erected a temporary 80-foot tower midway along the road to which ASTAC attached its cell site. The result – 4G cell service for the more than 150 camp workers who otherwise would only have been using hand held radios. This is yet another example of critical role that wireless deployment plays in public safety and supporting environmentally responsible domestic oil exploration for the homeland.

Roaming revenue from providing world class coverage in the Oil Patch also has allowed us to serve all of our communities who would otherwise be uneconomic to serve due to sparse populations, extraordinarily high operating costs, a vast geographic area without roads or electrical intertie, a 75-90 day construction season and extreme cold and inclement weather.



It took an eight hour rolligon ride (installation work crew sheltered in short bus) to get 18 miles to Midway site. Rolligons are used to traverse the frozen tundra. Their weight distribution across multiple low inflation, wide tires allows transport without harming the fragile ecosystem.



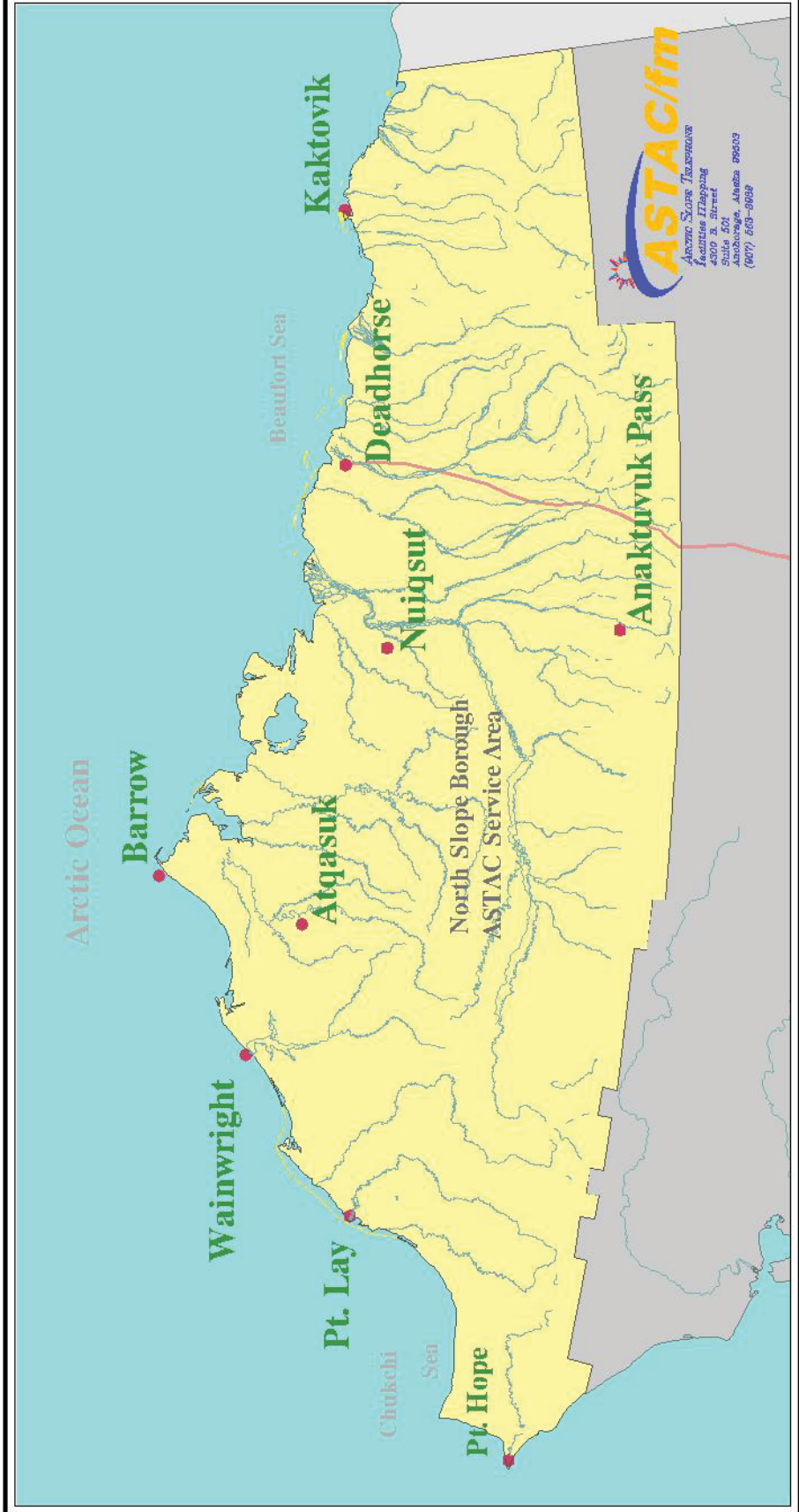
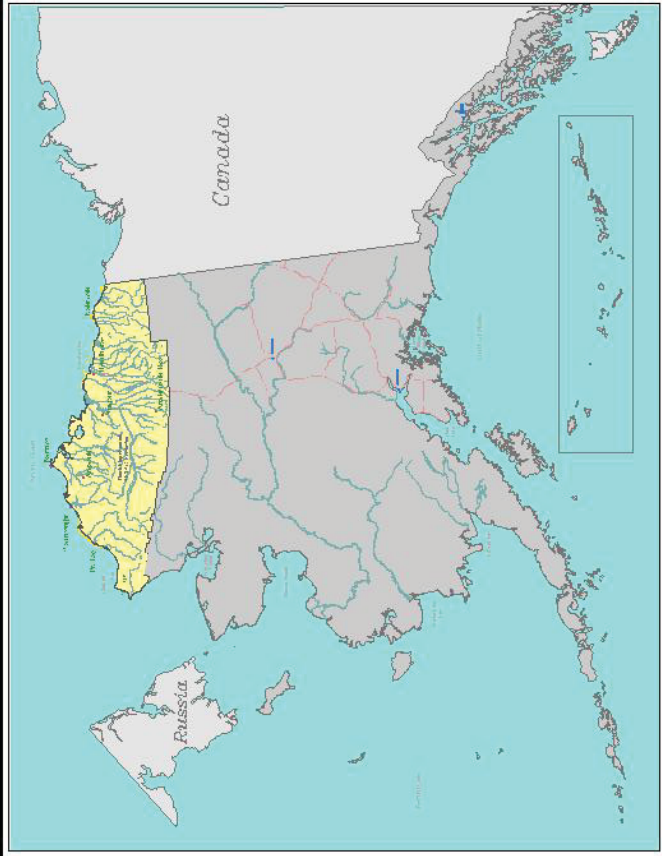
Afternoon sunrise, Midway exploration camp, NPR-A



## COMPARABLE AREAS



*Minnesota = 80,000 sq. miles*  
*North Slope Borough = 93,000 sq. miles*



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